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September 13, 2010

VIA ELECTRONIC SUBMISSION

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Tribune Company, Debtor-in-Possession*, MB Docket No. 10-104  
Notice of Ex Parte Presentation

Dear Ms. Dortch:

On September 10, 2010, Angela Campbell, Guilherme Roschke, and Matthew Rich, all of the Institute for Public Representation, and Andrew Schwartzman of Media Access Project, together acting as counsel for Carrie Biggs-Adams of the Communications Workers of America (“CWA”), Tracy Rosenberg of Media Alliance (via telephone), and other non-present parties who filed a petition to deny in this docket, met with William Lake, David Roberts, Adrienne Denysyk, Jim Brown, Virginia Metallo, Robert Ratcliffe, and Barbara Kreisman of the Media Bureau.

At the meeting, counsel noted that the Commission’s central policy favoring the gradual breakup of newspaper-broadcast cross-ownerships (“NBCO”) has not changed under the new waiver rules. Counsel also explained that comity with Tribune’s bankruptcy proceedings does not require the sale of Tribune’s media properties in their current cross-owned state.

Counsel then discussed the enormous precedential value of this decision, as it is the first application of the new NBCO rule. A grant of the waiver would show the enormity of the loopholes in the NBCO rule.

Counsel went on to discuss the relationship between the waiver applications, the pending 2010 Quadrennial Review, and any resulting new rules. It was noted that the grant or denial of waivers should not be conditioned on the review of any rules. Such conditioning would mean that rules and waivers would never have finality, as the Quadrennial Review dictates that rules

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are continually reviewed every four years. Counsel also pointed out that courts have stated that waiver applications are not the proper setting to challenge a rule's validity. It was also noted that original transfer to Zell still cannot be considered final because the Commission has not acted on the petition for reconsideration.

Finally, Ms. Biggs-Adams explained that CWA's goal is a strong newspaper serving the community and that the guild believes that local ownership is the best way to ensure this end. The best way to achieve local ownership is to break up newspaper-broadcast cross-ownerships.

Sincerely,

Guilherme Roschke  
Staff Attorney  
Matthew Rich  
Georgetown Law Student

cc (*via email*): Jim Brown  
Adrienne Denysyk  
Barbara Kreisman  
Virginia Metallo  
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